

AFFIDAVIT OF SERVICE BY MAIL.

STATE OF NEW YORK)  
  )SS  
COUNTY OF KINGS  )

I, Kathleen Goff, being duly sworn, depose and say: I am not a party to the action, am over 18 years of age and reside at Bronx, New York.

On September 8, 2006 I served the within

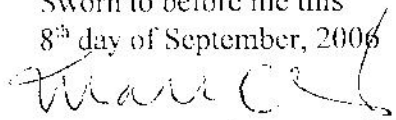
**PLAINTIFF'S FIRST DEMAND FOR INTERROGATORIES**

by depositing a true copy thereof in a post-paid wrapper in an official depository, under the exclusive care and custody of the U.S. Postal Service within New York State, addressed to the following persons at the last known address set forth after each name.

MICHAEL A. CARDOZO, ESQ.  
Corporation Counsel of the  
City of New York  
Attorney for Defendants  
City and NYPD  
100 Church Street - Room 3-209  
New York, New York 10007

  
Kathleen Goff

Sworn to before me this  
8<sup>th</sup> day of September, 2006



Notary Public

**MARK A. LONGO**  
**Notary Public, State of New York**  
**No.02LO4655104**  
**Qualified in Kings County**  
**Commission Expires July 31, 2009**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
PAULINE PIPITONE, as the Administrator of the  
Estate of NICHOLAS GUIDO, Deceased, and  
PAULINE PIPITONE, Individually,

**PLAINTIFF'S FIRST DEMAND  
FOR INTERROGATORIES** \_\_\_\_\_

Plaintiff,

**06-CV-145 (DGT)(JMA)**

-against-

THE CITY OF NEW YORK, THE NEW YORK  
CITY POLICE DEPARTMENT, STEPHEN  
CARACAPPA, (A retired member of the New York  
City Police Department) and LOUIS EPPOLITO  
(A retired member of the New York City Police  
Department),

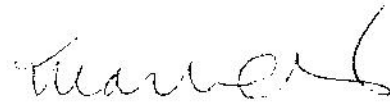
Defendants.

-----X  
S I R S:

PLEASE TAKE NOTICE, that the plaintiff, PAULINE PIPITONE, as the Administrator of the Estate of NICHOLAS GUIDO, Deceased, and PAULINE PIPITONE, Individually, by her attorneys LONGO & D'APICE, ESQS., pursuant to Rules 33 and 34 of the Federal Rules of Civil Procedure, hereby requests defendants to answer, under oath, the following written Interrogatories separately and fully in writing, within thirty (30) days after the date of service of this Notice. The Answers hereto shall include all information known up to the date of the verification thereof.

1. A true and complete copy of the New York Police Department Personnel files maintained with respect of defendants CARACAPPA and EPPOLITO.
2. Copies of the Rules, Regulations, Procedures and Guidelines concerning investigation of a potential Police Officer and acceptance into the Police Academy in effect at the time defendants CARACAPPA and EPPOLITO were hired.

Dated: Brooklyn, New York  
September 7, 2006



MARK A. LONGO, ESQ.  
LONGO & D'APICE, ESQS.  
Attorneys for Plaintiff  
26 Court Street - Suite 1700  
Brooklyn, New York 11242  
(718) 855-5684  
File No. N7783

TO: MICHAEL A. CARDOZO, ESQ.  
Corporation Counsel of the  
City of New York  
Attorneys for Defendants City and NYPD  
100 Church Street - Room 3-209  
New York, New York 10007  
(212) 676-1347

NO APPEARANCE BY DEFENDANTS  
STEPHEN CARACAPPA and  
LOUIS EPPOLITO

3. Copies of the records of defendant EPPOLITO'S departmental trial, including if stenographer recorded, a copy of the transcript and if tape recorded, a copy of the recording.
  4. A list of all Precincts and Departments that defendants CARACAPPA and EPPOLITO were assigned to during the time of their employment with the New York City Police Department.
  5. The badge numbers assigned to defendants CARACAPPA and EPPOLITO.
  6. The dates and offices of promotion given to defendants CARACAPPA and EPPOLITO.
  7. Copies of the productivity reports of defendants CARACAPPA and EPPOLITO.
  8. The procedures in effect within six (6) months of NICHOLAS GUIDO'S murder for New York City Police Department Personnel to utilize the New York City Police Department data bases.
  9. Copies of the sign in sheets to the New York City Police Department data base by defendants CARACAPPA and EPPOLITO within six (6) months of NICHOLAS GUIDO'S murder and copies of all print out sheets in response to their requests.
  10. Copy of the New York City Police Department file regarding the investigation of the death of NICHOLAS GUIDO, including inter office Precinct memos and/or correspondence regarding the investigation, the name and current status of all officers and detectives involved in the investigation.
  11. Copies of complete files monitored by the New York City Police Department Organized Crime Unit with regard to defendants CARACAPPA and EPPOLITO.
-